

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

SANDRA VILLERS (01)

Criminal No. 3:16-CR-78-N

FILED UNDER SEAL

GOVERNMENT'S MOTION FOR DOWNWARD DEPARTURE
PURSUANT TO USSG § 5K1.1

TO THE HONORABLE DAVID C. GODBEY, UNITED STATES DISTRICT JUDGE:

The United States moves the Court to depart downward **four offense levels** from the otherwise applicable guideline range in imposing sentence upon the defendant, Sandra Villers, in recognition of his substantial assistance to the government in the investigation and prosecution of others. In support of the same, the United States would show:

Under the provisions of *U.S.S.G. § 5K1.1*, the Court, in determining whether and to what extent to grant a departure for substantial assistance to the Government, should evaluate: (1) the significance and usefulness of the defendant's assistance, taking into consideration the government's evaluation of the assistance rendered; (2) the truthfulness, completeness, and reliability of any information or testimony provided by the defendant; (3) the nature and extent of the defendant's assistance; (4) any injury suffered, or any danger or risk of injury to the defendant or his family resulting from his assistance; and (5) the timeliness of the defendant's assistance. The government will address each of those considerations in turn.

Significance and Usefulness of Defendant's Assistance

The defendant was interviewed by investigators from DEA on multiple occasions dating back to her arrest in the instant case. Since her arrest, Villers' cooperation with law enforcement was instrumental in obtaining guilty pleas for at least one of the co-defendants in this case. Had Villers not agreed to cooperate and testify against her co-defendants, the government firmly believes this individual would have proceeded to trial.

Truthfulness, Completeness, and Reliability

The interviewing agents, through corroboration of other debriefs and statements, believe that the defendant has provided truthful and complete information regarding her and other's involvement in the events that give rise to count of conviction.

The Nature and Extent of the Defendant's Cooperation

The government believes that the preceding paragraphs have delineated the nature and extent of the defendant's cooperation and demonstrate that her cooperation has materially advanced the Government's investigation and potential prosecution of others.

Danger, Injury or Risk of Danger to the Defendant

The government does not have any information to suggest that the defendant's cooperation has led to any danger, injury or risk of danger to the defendant.

Timeliness

Defendant Villers' cooperation was timely in regards to the instant case.

Government's Recommendation

In recognition of the defendant's substantial assistance and the quality of her information, the United States respectfully requests that the Court depart from the

applicable guideline range by **four offense levels**.

Respectfully submitted,

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UNITED STATES ATTORNEY

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APPROVED FOR FILING

/s/ Alex Lewis
ALEX LEWIS
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CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2016 I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Brian D. Poe
BRIAN D. POE
Assistant United States Attorney